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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2013 Grand Jury

CR13-0642

11	UNITED STATES OF AMERICA,)	CR No.
12	Plaintiff,)	<u>I N D I C T M E N T</u>
13	v.)	[18 U.S.C. § 879: Threats
14	LUIS RICARDO RODRIGUEZ,)	Against Former Presidents and
15	Defendant.)	Certain Other Persons; 18 U.S.C.
16)	§ 871: Threats Against the
17)	President; 18 U.S.C. § 878:
)	Threats Against Foreign
)	Officials]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 879(a)(1)]

On or about April 21, 2012, in Los Angeles County, within the Central District of California, defendant LUIS RICARDO RODRIGUEZ knowingly and willfully threatened to kill and inflict bodily harm upon a former President of the United States, that is, defendant RODRIGUEZ stated in a public website post that he wanted to kill former President William J. Clinton.

1 COUNT TWO
2 [18 U.S.C. § 879(a)(1)]
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4 On or about April 21, 2012, in Los Angeles County, within
5 the Central District of California, defendant LUIS RICARDO
6 RODRIGUEZ knowingly and willfully threatened to kill and inflict
7 bodily harm upon a member of the immediate family of a former
8 President of the United States, that is, defendant RODRIGUEZ
9 stated in a public website post that he wanted to kill Hillary
Rodham Clinton, wife of former President William J. Clinton.
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1 COUNT THREE

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 10, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a member of the immediate family of a former President
7 of the United States, that is, defendant RODRIGUEZ stated in an
8 email that he would kill Hillary Rodham Clinton, wife of former
9 President William J. Clinton.

1 COUNT FOUR

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 11, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a member of the immediate family of a former President
7 of the United States, that is, defendant RODRIGUEZ stated in an
8 email that he wanted to kill Hillary Rodham Clinton, wife of
9 former President William J. Clinton.

1 COUNT FIVE

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 11, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a former President of the United States, that is,
7 defendant RODRIGUEZ stated in an email that he wanted to kill
8 former President William J. Clinton.

1 COUNT SIX
2 [18 U.S.C. § 879(a)(1)]
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4 On or about May 11, 2012, in Los Angeles County, within the
5 Central District of California, defendant LUIS RICARDO RODRIGUEZ
6 knowingly and willfully threatened to kill and inflict bodily
7 harm upon a former President of the United States, that is,
8 defendant RODRIGUEZ stated in an email that he wanted to kill
former President George W. Bush.
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1 COUNT SEVEN

2 [18 U.S.C. § 871]

3 On or about May 11, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to take the life of and
6 inflict bodily harm upon the President of the United States,
7 that is, defendant RODRIGUEZ stated in an email that he wanted
8 to kill President Barack H. Obama.

1 COUNT EIGHT

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 19, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a member of the immediate family of a former President
7 of the United States, that is, defendant RODRIGUEZ stated in an
8 email that he wanted to kill Hillary Rodham Clinton, wife of
9 former President William J. Clinton.

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1 COUNT NINE

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 19, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a former President of the United States, that is,
7 defendant RODRIGUEZ stated in an email that he wanted to kill
8 former President William J. Clinton.

1 COUNT TEN
2 [18 U.S.C. § 871]
3
4 On or about May 23, 2012, in Los Angeles County, within the
5 Central District of California, defendant LUIS RICARDO RODRIGUEZ
6 knowingly and willfully threatened to kill and inflict bodily
7 harm upon the President of the United States, that is, defendant
8 RODRIGUEZ stated in an email that he would kill President Barak
H. Obama.
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1 COUNT ELEVEN

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 23, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a former President of the United States, that is,
7 defendant RODRIGUEZ stated in an email that he would kill former
8 President William J. Clinton.

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1 COUNT TWELVE

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 23, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a member of the immediate family of a former President
7 of the United States, that is, defendant RODRIGUEZ stated in an
8 email that he would kill Hillary Rodham Clinton, wife of former
9 President William J. Clinton.

1 COUNT THIRTEEN

2 [18 U.S.C. § 878(a)]

3 On or about May 23, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to make a violent attack upon
6 the official premises of foreign officials that would likely
7 endanger their persons and liberty, that is, defendant RODRIGUEZ
8 stated in an email that he would attack the Consulate of Israel
9 in Los Angeles with a deadly and dangerous weapon, namely, a
10 fire-bomb, in violation of Section 112 of Title 18 of the United
11 States Code.

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1 COUNT FOURTEEN

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 23, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a member of the immediate family of a former President
7 of the United States, that is, defendant RODRIGUEZ stated in an
8 email that he would kill Chelsea Clinton, daughter of former
9 President William J. Clinton.

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1 COUNT FIFTEEN

2 [18 U.S.C. § 879(a)(1)]

3 On or about May 23, 2013, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kill and inflict bodily
6 harm upon a member of the immediate family of a former President
7 of the United States, that is, defendant RODRIGUEZ stated in an
8 email that he would kill Barbara Bush and Jenna Bush, daughters
9 of former President George W. Bush.

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1 COUNT SIXTEEN

2 [18 U.S.C. § 879(a)(2)]

3 On or about May 23, 2012, in Los Angeles County, within the
4 Central District of California, defendant LUIS RICARDO RODRIGUEZ
5 knowingly and willfully threatened to kidnap, kill and inflict
6 bodily harm upon a member of the immediate family of the
7 President of the United States, that is, defendant RODRIGUEZ
8 stated in an email that he would kidnap and kill S.O. and M.O.,
9 daughters of President Barack H. Obama.

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1 COUNT SEVENTEEN

2 [18 U.S.C. § 879(a)(1)]

3 On or about November 29, 2012, in Los Angeles County,
4 within the Central District of California, defendant LUIS
5 RICARDO RODRIGUEZ knowingly and willfully threatened to kill and
6 inflict bodily harm upon a former President of the United
7 States, that is, defendant RODRIGUEZ stated in an email that he
8 wanted to kill former President William J. Clinton.

1 COUNT EIGHTEEN

2 [18 U.S.C. § 879(a)(1)]

3 On or about November 29, 2012, in Los Angeles County,
4 within the Central District of California, defendant LUIS
5 RICARDO RODRIGUEZ knowingly and willfully threatened to kill and
6 inflict bodily harm upon a member of the immediate family of a
7 former President of the United States, that is, defendant
8 RODRIGUEZ stated in an email that he wanted to kill Hillary
9 Rodham Clinton, wife of former President William J. Clinton.

1 COUNT NINETEEN

2 [18 U.S.C. § 879(a)(1)]

3 On or about November 29, 2012, in Los Angeles County,
4 within the Central District of California, defendant LUIS
5 RICARDO RODRIGUEZ knowingly and willfully threatened to kill and
6 inflict bodily harm upon a former President of the United
7 States, that is, defendant RODRIGUEZ stated in an email that he
8 wanted to kill former President George W. Bush.

1 COUNT TWENTY

2 [18 U.S.C. § 871]

3 On or about November 29, 2012, in Los Angeles County,
4 within the Central District of California, defendant LUIS
5 RICARDO RODRIGUEZ knowingly and willfully threatened to take the
6 life of and inflict bodily harm upon the President of the United
7 States, that is, that defendant LUIS RICARDO RODRIGUEZ stated in
8 an email that he wanted to kill President Barack H. Obama.

1 COUNT TWENTY-ONE
2 [18 U.S.C. § 879(a)(1)]

3 On or about December 4, 2012, in Los Angeles County, within
4 the Central District of California, defendant LUIS RICARDO
5 RODRIGUEZ knowingly and willfully threatened to kill and inflict
6 bodily harm upon a member of the immediate family of a former
7 President of the United States, that is, defendant RODRIGUEZ
8 stated in an email that he wanted to kill Chelsea Clinton,
9 daughter of former President William J. Clinton.

1 COUNT TWENTY-TWO
2 [18 U.S.C. § 879(a)(1)]

3 On or about December 4, 2012, in Los Angeles County, within
4 the Central District of California, defendant LUIS RICARDO
5 RODRIGUEZ knowingly and willfully threatened to kill and inflict
6 bodily harm upon a former President of the United States, that
7 is, defendant RODRIGUEZ stated in an email that he wanted to
8 kill former President William J. Clinton.

1 COUNT TWENTY-THREE
2 [18 U.S.C. § 879(a)(1)]

3 On or about December 4, 2012, in Los Angeles County, within
4 the Central District of California, defendant LUIS RICARDO
5 RODRIGUEZ knowingly and willfully threatened to kill and inflict
6 bodily harm upon a member of the immediate family of a former
7 President of the United States, that is, defendant RODRIGUEZ
8 stated in an email that he wanted to kill Hillary Rodham
9 Clinton, wife of former President William J. Clinton.

1 COUNT TWENTY-FOUR
2 [18 U.S.C. § 879(a)(1)]

3 On or about December 4, 2012, in Los Angeles County, within
4 the Central District of California, defendant LUIS RICARDO
5 RODRIGUEZ knowingly and willfully threatened to kill and inflict
6 bodily harm upon a member of the immediate family of a former
7 President of the United States, that is, defendant RODRIGUEZ
8 stated in an email that he wanted to kill "the daughters" of
9 former President George W. Bush.

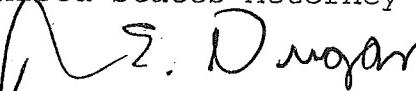
1 COUNT TWENTY-FIVE
2 [18 U.S.C. § 879(a)(2)]

3 On or about December 4, 2012, in Los Angeles County, within
4 the Central District of California, defendant LUIS RICARDO
5 RODRIGUEZ knowingly and willfully threatened to kill and inflict
6 bodily harm upon a member of the immediate family of the
7 President of the United States, that is, defendant RODRIGUEZ
8 stated in an email that he wanted to kill S.O. and M.O.,
9 daughters of President Barack H. Obama.

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11 A TRUE BILL

12 151
13 Foreperson

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15 ANDRÉ BIROTTÉ JR.
United States Attorney

16 

17 ROBERT E. DUGDALE
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